



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-16J

Sent by Certified Mail # 7017 1450 0001 3747 9998

August 7, 2018

Mr. Gerald Ruopp
 Central Wire, Inc.
 Techalloy Company, Inc.
 6509 Olson Road
 Union, Illinois 60180

Re: June 2018 Monthly Progress Report, Central Wire, Illinois Plant
 EPA ID # ILD 005 178 975, Administrative Order on Consent (AOC)
 Docket No. R8H-5-99-008

Dear Mr. Ruopp,

The United States Environmental Protection Agency (EPA) EPA has reviewed the June 2018 Monthly Progress Report for the Techalloy Facility in Union, Illinois. EPA's comments are;

1. Groundwater Pump and Treat System: note yet another drop-in pumping at EW-2, and the potential for continued loss of plume capture. Despite their claim that they are working to "...quickly address the flow reduction situation..." and that "...CWI is focusing on increasing production in EW-2...", Central Wire (CW) has been claiming they're considering resolving this decrease for quite some time with no discernible activity, let alone results. Extraction Well EW-2 production has decline from a high of 758,000 gallons per day (GPD) in May of 2015 to a low of 307,00 gpd in June 2018. That is a drop of 451,000 gpd over three years of groundwater that was not treated.

CW shall provide a schedule of what steps they plan to take to rehabilitate EW-2 and when those steps are likely to be completed. Alternatively, CW shall demonstrate with field data (water level and water quality) that this well remains capable of capturing the plume that currently exists in this area under a scenario of continually lowered pumping rates.

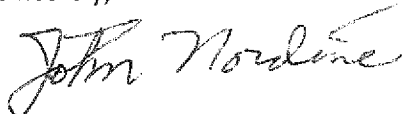
This issue is especially important to plume capture because the VOC data indicate well EW-2 pumps from the more contaminated part of the aquifer.

CW Quarterly Extraction Well Samples: CW's statement that "...there does not appear to be a trend associated with the decreased production from EW-2" appears to be correct as far as it goes. However, there are two periods of anomalous VOC data in this well according to Table 2 and highlighted by the graphs. Quarters 5 (1st quarter 2015) and 15 (3rd quarter 2017) are both associated with low TCE, TCA, and PCE and high DCE in EW-2. It's somewhat difficult to judge because different methods of describing dates are used, but these sampling events appear to be associated with lower than typical pumping from (shut down of) EW-2 associated with well maintenance. This data indicates EW-2 is in a part of the plume where biodegradation effects are more pronounced and that as this well is pumped it pulls in water from more distal parts of the plume where biodegradation is less active and the plume has more MCL exceedances. These data may indicate that as EW-2 loses capture the potential is for the contamination plume to migrate toward the residences on Route 176.

2. DGW-2 sampling results: CW can't write "there have been no detections in these three wells; ..." and immediately after the semi-colon note the detection of VOCs in DGW-2D, no matter how low the concentration. As written, this statement is not true. It needs to be revised so it is accurate.
3. Pump and Treat System Monthly NPDES Samples: VOC concentrations in the effluent continue to rise, including a TCE concentration in the effluent above the MCL. Note that the TCE concentration in the effluent is higher than its estimated concentration in the influent according to table 1. CW needs to explain why the treatment system is losing efficacy, and what they plan to do about it. CW should provide a plot of VOC concentrations in the effluent, beginning in January of this year, in all future monthly reports so we can more readily evaluate the treatment. This issue may or may not also be relevant to the re-issuing of the NPDES permit.
4. Ex. 6 Personal Privacy (PP) Well samples: methylene chloride was detected in irrigation well 1 and acetone was detected in irrigation well 2. These compounds were detected in the Trip Blank and are not representative of groundwater quality. However, it is inaccurate for CW to state "There were no detections of volatile organic compounds in either well". The text should be revised to accurately describe the situation with these samples.
5. When preparing the chain-of-custody form make sure all the sample are on the sheet. Test America noted that the trip blank and the DGW2I samples were not accounted for on the chain-of-custody.
6. Figure 2. Convention is to place the north side of the map on the top.
7. Table 6: Parameter readings are supposed to be taken every 3 minutes, ideally every 5. The last readings at MW-4 and at Ex. 6 Personal Privacy (PP) were taken every 2 minutes.
8. Provide a schedule for when the plume migration GeoProbe will begin.

A reply is required in 30-days. Should you have any questions, regarding this letter, need any additional information, or wish to discuss this matter further, please contact me at (312) 353-1243 or contact me by email to nordine.john@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "John Nordine". The signature is written in a cursive, flowing style.

John Nordine, CPG, LPG
Project Manager
Corrective Action Section 2

Cc: Sarah Stillman, U.S. EPA
Jack Thorsen, Autumnwood ESH Consultants